

BEFORE THE BOARD OF INQUIRY

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of a Board of Inquiry appointed under section 146 of the Resource Management Act 1991 to consider an application by Mighty River Power Limited for resource consents to construct, operate and maintain a wind farm at Turitea

**MEMORANDUM OF COUNSEL FOR MIGHTY RIVER POWER LIMITED REGARDING
SITE VISIT**

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MAY IT PLEASE THE BOARD:

1. This memorandum responds to that from Mr Maassen of 4 August 2009.
2. At paragraph 2 he records what is said to be PNCC's "advice" that photomontages "to some extent flatten elements within view". The Board is asked to visit residential viewpoints 1 and 22 and then "compare and contrast" the visual prominence of Te Rere Hau shown in the montage and the Board's own visual observations. Mighty River Power will refer to these photomontages in Mr Wyatt's evidence, but records that the photomontage in question has amplified the Turitea turbines by "whitening", whereas those at Te Rere Hau have not been so treated. They are simply photographed.
3. At paragraph 3, the memorandum refers to PNCC not accepting Mr Wyatt's assessment of visibility of turbines in the Palmerston North catchment and in particular, the visibility described in the report by Mr Wyatt attached to the AEE dated August 2008 describing the zones of visual influence. The memorandum asks the Board to consider the visibility of T3 (110m height from base to tip) from locations up to 12km from T3. The evidence and the AEE make the point that A3 representation is imperfect, an A0 sheet should be utilised for comparison. As it stands, there is no disagreement with what is implicit in Mr Maassen's statement, but reference to the A0 representation should be made. Mighty River Power has gone to a visual zone of 18km.

Nicholas Davidson

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4 August 2009